

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17-BK-3283-LTS

(Jointly Administered)

**This filing relates to the
Commonwealth.**

**ORDER GRANTING FIVE HUNDRED FORTY-SIXTH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO TO MISCLASSIFIED, PARTIALLY SATISFIED, AND OVERSTATED CLAIMS**

Upon the *Five Hundred Forty-Sixth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Misclassified, Partially Satisfied, and Overstated Claims* (“Five Hundred Forty-Sixth Omnibus Objection”)² of the Commonwealth of Puerto Rico (the “Commonwealth” or the “Objecting Debtor”), dated October 28, 2022, for entry of an order

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Five Hundred Forty-Sixth Omnibus Objection.

reclassifying and reducing certain claims filed against the Objecting Debtor as general unsecured claims, as more fully set forth in the Five Hundred Forty-Sixth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Five Hundred Forty-Sixth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Five Hundred Forty-Sixth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in Exhibit A to the Five Hundred Forty-Sixth Omnibus Objection (the “Claims to Be Reclassified”) assert an incorrect or improper priority or classification and have been partially satisfied and/or are overstated, as set forth in Exhibit A hereto; and the Court having determined that the relief sought in the Five Hundred Forty-Sixth Omnibus Objection is in the best interest of the Objecting Debtor, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Five Hundred Forty-Sixth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Five Hundred Forty-Sixth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Reclassified are hereby reclassified, reduced, and allowed, as set forth in the columns entitled “Modified and Allowed” in Exhibit A to the Five Hundred Forty-Sixth Omnibus Objection, respectively; and it is further

ORDERED that this Order resolves Docket Entry No. 22750 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Five Hundred Forty-Sixth Omnibus Objection

Five Hundred Forty-Sixth Omnibus Objection

Exhibit A - Claims to Be Reclassified, Reduced, and Allowed

ASSERTEDMODIFIED AND ALLOWED

	NAME	CLAIM #	DEBTOR	PRIORITY STATUS	AMOUNT	DEBTOR	PRIORITY STATUS	AMOUNT
1	EDGARDO BOBE DBA COMPUTER AND PRINTER SOLUTIONS PARCELAS CASTILLO BUZÓN E-1 MAYAGUEZ, PR 00682	14203	Commonwealth of Puerto Rico Commonwealth of Puerto Rico	503(b)(9) Secured	Undetermined* \$2,777.00*	Commonwealth of Puerto Rico	Unsecured	\$2,777.00
				Subtotal	\$2,777.00*			
Reason: The claimant failed to provide prima facie evidence to support a secured claim. Additionally, goods listed on the proof of claim were received outside of the prescribed 20-day receipt period pursuant to 11 U.S.C. § 503(b)(9) and as such, claimant is not entitled to administrative priority. As such, the claim should be reclassified as a general unsecured claim. The Proof of Claim, documents attached to the Proof of Claim, and/or additional documentation received from the claimant and/or the Puerto Rico Fiscal Agency and Financial Advisory Authority supports a total of \$2,777.00 for the claim, and such amount fully liquidates the claim. Claimant will retain a general unsecured claim allowed in the amount of \$2,777.00.								
2	TECHNICAL MAINTENANCE SERVICES PO BOX 3826 GUAYNABO, PR 00970	31391	Commonwealth of Puerto Rico Commonwealth of Puerto Rico	503(b)(9) Unsecured	\$10,520.50 \$10,520.50	Commonwealth of Puerto Rico	Unsecured	\$904.50
				Subtotal	\$21,041.00			
Reason: Goods listed on the proof of claim were received outside of the prescribed 20-day receipt period pursuant to 11 U.S.C. § 503(b)(9) and as such, claimant is not entitled to administrative priority. As such, the claim should be reclassified as a general unsecured claim. Claimant also asserts a total claim amount of \$10,520.50 in box 8 of the proof of claim, however, claimant also wrote the same amount in boxes 10 & 13 of the proof of claim, causing the claim to be placed on the register in the amount of \$21,041.00. As such, the claim is overstated and should be reduced to \$10,520.50. Further, invoice(s) totaling \$9,616.00 were paid via checks 00174837 and 00176038 on 05/24/2018 and 06/05/2018. As such, the claim should be further reduced to \$904.50. Claimant will retain a general unsecured claim allowed in the amount of \$904.50.								
3	TECHNICAL MAINTENANCE SERVICES PO BOX 3826 GUAYNABO, PR 00970	32841	Commonwealth of Puerto Rico Commonwealth of Puerto Rico	503(b)(9) Unsecured	\$130.00 \$130.00	Commonwealth of Puerto Rico	Unsecured	\$130.00
				Subtotal	\$260.00			
Reason: Claimant asserts administrative priority pursuant to 11 U.S.C. § 503(b)(9), but the proof of claim is not for goods sold and as such, claimant is not entitled to administrative priority. As such, the claim should be reclassified as a general unsecured claim. Claimant asserts a total claim amount of \$130.00 in box 8 of the proof of claim, however, claimant also wrote the same amount in boxes 10 & 13 of the proof of claim, causing the claim to be placed on the register in the amount of \$260.00. As such, the claim is overstated and should be reduced to \$130.00. Claimant will retain a general unsecured claim allowed in the amount of \$130.00.								